

Uploaded: 2022DEC06 13:36 Filed By:Bar# 89668 AWHITELAW Reference: EF-113747  
E-Filed: 2022DEC06 RICHMOND CITY CC JCRIGGER at 2022DEC07 09:26 CL22005367-00

VIRGINIA:

IN THE CITY OF RICHMOND CIRCUIT COURT  
Case No:

TYREE JOHNSON

Plaintiff,

v.

SHENG LIU

and

**Jury Trial Demanded**

QQ BUS LINE CORPORATION

and

FLIXBUS, INC.

Defendants.

**COMPLAINT**

The Plaintiff, Tyree Johnson, by counsel, hereby moves for judgment against the Defendants, Sheng Liu, QQ Bus Line Corporation, and FlixBus, Inc. jointly and severally, on the grounds and in the amount as described below.

**PARTIES**

1. Plaintiff is a citizen and resident of the Commonwealth of Virginia.
2. Defendant Sheng Liu ("Liu") is a citizen and resident of the state of New York.
3. Defendant QQ Bus Line Corporation ("QQ Bus") was incorporated in the Commonwealth of Massachusetts with a principal place of business located in Hanover, Massachusetts.
4. QQ Bus is an interstate passenger carrier pursuant to the Federal Motor Carrier Safety Act.
5. At all relevant times, QQ Bus has regularly and systematically transacted substantial business in Virginia and is subject to the jurisdiction of this court.
6. Defendant FlixBus, Inc. ("FlixBus") was incorporated in the state of California with a principal place of business located in Los Angeles, California.

7. At all relevant times, FlixBus has regularly and systematically transacted substantial business in Virginia and is subject to the jurisdiction of this court.

### **BACKGROUND**

8. On or about May 24, 2022, Plaintiff was operating his Dodge vehicle Southbound on I-95 near West Laburnum Avenue in the City of Richmond, Virginia.

9. At that time and place, Liu was operating a passenger bus on Southbound I-95 directly behind Plaintiff.

10. At that time and place, Plaintiff was slowing or stopped due to traffic ahead of him.

11. At that time and place, Liu failed to stop, crashing into the rear of Plaintiff's vehicle.

12. At all relevant times, Liu was an agent/employee of QQ bus.

13. At All relevant times, Liu was operating the bus in the course and scope of his employment with QQ Bus.

14. QQ Bus and FlixBus organized, conducted, promoted, managed, and/or operated interstate passenger carriers.

15. QQ Bus and FlixBus organized, conducted, promoted, managed, and/or operated the bus driven by Liu on May 24, 2022.

16. Upon information and belief, at all relevant times, the bus being operated by Liu displayed US DOT number 2586802.

17. At all relevant times, QQ Bus has been registered under US DOT number 2586802.

### **NEGLIGENCE**

18. At all relevant times, Liu owed a duty to use reasonable care under the circumstances in connection with the use, operation, and driving of the bus. These duties include operating the vehicle at a reasonable speed, not follow too closely, keep his vehicle under control, pay proper time and attention, and comply with laws, regulations, standards, customs, usages, and practices for the safe operation of motor vehicles and interstate passenger carriers for hire.

19. Despite having these and other duties, Defendant violated his duties of reasonable care, causing the above-described collision.

20. The above-described collision was directly and proximately caused by Liu's carelessness and negligence in the operation of the bus.

21. QQ Bus is liable for the harm caused by Liu's wrongful acts and omissions alleged herein, under the law of vicarious liability, agency liability, and respondeat superior liability and other principles of law.

22. FlixBus is liable for the harm caused by Liu's wrongful acts and omissions alleged herein, under the law of vicarious liability, agency liability, and respondeat superior liability and other principles of law.

23. As a proximate result of Defendants negligence, Plaintiff was caused to suffer serious injuries; has incurred and will incur a loss of earnings and earning capacity; has suffered and will suffer in the future pain of body and mind; has incurred and will incur in the future medical and related expenses; and has incurred other damages as allowed by law.

WHEREFORE, Plaintiff, Tyree Johnson, demands judgment, jointly and severally, against Defendants Sheng Liu, QQ Bus Line Corporation, and FlixBus, Inc., for compensatory damages in the amount of ONE HUNDRED TWENTY-FIVE THOUSAND DOLLARS (\$125,000), plus pre-judgment and post-judgment interest and costs.

**Trial by jury is demanded.**

TYREE JOHNSON

By: \_\_\_\_\_

Of Counsel

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*Attorney for Plaintiff*

COMMONWEALTH OF VIRGINIA



RICHMOND CITY CIRCUIT COURT  
Civil Division  
400 NORTH 9TH STREET  
RICHMOND VA 23219

Summons

To: FLIXBUX INC  
C/O CT CORPORATION SYSTEM R/A  
4701 COX ROAD STE 285  
GLEN ALLEN VA 23060

Case No. 760CL22005367-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, March 06, 2023

Clerk of Court: EDWARD F JEWETT

by   
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: WHITELAW, AMY  
804-799-9993



**CT Corporation**  
**Service of Process Notification**  
03/15/2023  
CT Log Number 543413717

**Service of Process Transmittal Summary**

**TO:** Gene Nichols  
Greyhound Lines, Inc.  
315 CONTINENTAL AVE  
DALLAS, TX 75207-4303

**RE:** Process Served in Virginia

**FOR:** FlixBus, Inc. (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: TYREE JOHNSON // To: FlixBus, Inc.

**CASE #:** 760CL2200536700

**NATURE OF ACTION:** Personal Injury - Vehicle Collision

**PROCESS SERVED ON:** C T Corporation System, Glen Allen, VA

**DATE/METHOD OF SERVICE:** By Process Server on 03/15/2023 at 09:26

**JURISDICTION SERVED:** Virginia

**ACTION ITEMS:** SOP Papers with Transmittal, via UPS Next Day Air  
Image SOP  
Email Notification, Gene Nichols gene.nichols@flixbus.com  
Email Notification, Lisa Zemanek lisa.zemanek@flixbus.com  
Email Notification, George Cervantes george.cervantes@flixbus.com

**REGISTERED AGENT CONTACT:** C T Corporation System  
4701 Cox Road, Suite 285  
Glen Allen, VA 23060  
877-564-7529  
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



## PROCESS SERVER DELIVERY DETAILS

**Date:** Wed, Mar 15, 2023  
**Server Name:** Sharon Sims

Entity Served	FLIXBUX INC
Case Number	760CL2200536700
Jurisdiction	VA

Inserts		

